

ORIGINAL

TMA®**TRUCK****MANUFACTURERS**

DEPT. OF TRANSPORTATION

ASSOCIATION®

99-JUL-2 AM 10:18

1225 New York Avenue, NW-Suite 300
Washington, DC 20005-6156
Phone: 202/638-7825 • Fax: 202/737-374257782
June 21, 1999NHTSA-99-5101-6
250 Bridge Street-Suite 100
Carleton Place, ON K7C 3P4
Phone: 613/253-8858 • Fax: 613/253-8859

Mr. L. Robert Shelton
Associate Administrator for
Safety Performance Standards
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Shelton:

**REFERENCE: Truck Splash and Spray - Report to Congress - Request for Comments
[Docket No. NHTSA-99-101; Notice 1]**

The Truck Manufacturers Association (TMA), whose members include all of the major U.S. manufacturers of medium and heavy-duty trucks (greater than 8845 kilograms (19,500 pounds) gross vehicle weight rating) submits the following comments in response to the subject Notice. TMA member companies include: **Ford Motor Company, Freightliner Corporation, General Motors Corporation, Mack Trucks, Inc., Navistar International Transportation Corp., PACCAR Inc, Volvo Trucks North America and Western Star Trucks Inc.**

As noted by the agency, since 1991 there has been a European Directive (91/226/EEC) which defines type approval procedures for spray suppression systems on heavy vehicles. There are performance requirements for the splash and spray suppression devices, but not for the total vehicle once equipped with such devices. The introductory paragraphs of the Directive state that a performance test on vehicles fitted with splash and spray reduction devices would be established as soon as possible. This is important since the formation of splash and spray depends on many parameters including the characteristics of the road surface, the tire tread configuration, environmental conditions such as wind speed and direction, and the speed and aerodynamic characteristics of the vehicle. As far as we are aware, the European total vehicle performance test has never been developed and only three countries are currently enforcing this Directive. Further, we know of no objective data quantifying the benefit, if any, of the splash and spray suppression devices fitted to some European trucks.

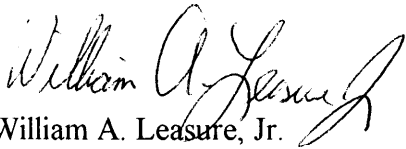
On the basis of comprehensive studies, the agency, in 1998 and again in 1994, decided that rulemaking to mandate the use of splash and spray suppression devices on medium and heavy-duty trucks was not warranted. The principal reasons for these two decisions were the facts that the crash data did not support the position that heavy truck splash and spray was a major safety problem in terms of crashes caused and injuries in those crashes and truck manufacturers were working to reduce the splash and spray generated by their vehicles in the absence of any

government requirements for them to do so. Reduction of splash and spray is taken into consideration by truck manufacturers during the design of their vehicles. Also, the industry voluntarily completed development of SAE J2245 - Recommend Practice for Splash and Spray Evaluation, as noted in the preamble to this Notice.

Since we are not aware of any new data or information that would alter these previous decisions by the agency, we recommend that NHTSA again decide not to pursue rulemaking in this area. The basis for this recommendation is that practicable solutions that consistently and significantly reduce splash and spray from medium and heavy-duty trucks have not been demonstrated and the motor vehicle safety need has not been identified.

We appreciate your consideration of these comments. TMA staff are available to provide additional information the agency may require.

Sincerely,

A handwritten signature in black ink, appearing to read "William A. Leasure, Jr.", written in a cursive style.

William A. Leasure, Jr.
Executive Director

cc: Docket - 2 copies.